

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MUSGRAVE
TO UPS INTERROGATORIES UPS/USPS -T9-1 -14
(October 24, 2001)

The United States Postal Service hereby provides the response of witness Musgrave to the following interrogatories of United Parcel Service: UPS/USPS-T9-1 -14, filed on October 10, 2001. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:


Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992; Fax -5402
October 24, 2001

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-1. Provide for BY2000 (i) the volume of Express Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimates are provided below.

1(i). The estimate for GFY 2000 is approximately 24 percent.

1(ii). The estimate for GFY 2000 is approximately 76 percent.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-2. Provide for BY2000 (i) the volume of Express Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If the information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimates are provided below.

2(i). The estimate for GFY 2000 is approximately 26 percent.

2(ii). The estimate for GFY 2000 is approximately 74 percent.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-3. Provide for Express Mail the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal

Service, that the best available estimate for GFY 2000 is approximately 13 percent.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-4. Provide for Express Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimate for GFY 2000 is approximately 63 percent.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-5. Provide for Express Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimate for GFY 2000 is approximately 12 percent.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-6. Provide for Express Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimate for GFY 2000 is approximately 13 percent.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-7. Refer to page 40 of your testimony, USPS-T-9, at 40, where you discuss "Christmas Express Mail."

(a) Provide for BY2000 (i) the volume of Christmas Express Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(b) Provide for BY2000 (i) the volume of Christmas Express Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If the information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide for Christmas Express Mail the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide for Christmas Express Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide for Christmas Express Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide for Christmas Express Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

7 a-f. I am informed that the Postal Service does not have the information requested and cannot provide estimates.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-8. Provide for BY2000 (i) the volume of Priority Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimates are provided below.

8(i). The estimate for GFY 2000 is 150 million pieces.

8(ii). The estimate for GFY 2000 is 1072 million pieces.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-9. Provide for by BY2000 (i) the volume of Priority Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal

Service, that the best available estimates are provided below.

9(i). The estimate for GFY 2000 is 378 million pieces.

9(ii). The estimate for GFY 2000 is 845 million pieces.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-10. *Provide for Priority Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.*

RESPONSE:

It is my understanding, based on figures provided by the Postal

Service, that the best available estimate for GFY 2000 is 797 million pieces.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-11. *Provide for Priority Mail the volume that was sent by businesses to residential customers in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.*

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimate for GFY 2000 is 275 million pieces.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-12. Provide for Priority Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal Service, that the best available estimate for GFY 2000 is 103 million pieces.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-13. Provide for Priority Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

It is my understanding, based on figures provided by the Postal

Service, that the best available estimate for GFY 2000 is 48 million pieces.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MUSGRAVE TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T9-14. Refer to pages 19-20 of your testimony, USPS-T-9. at 19-20, where you refer to "Christmas Priority Mail."

(a) Provide for BY2000 (i) the volume of Christmas Priority Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(b) Provide for by BY2000 (i) the volume of Christmas Priority Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide for Christmas Priority Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide for Christmas Priority Mail the volume that was sent by businesses to residential customers in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide for Christmas Priority Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide for Christmas Priority Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

14 a-f. I am informed that the Postal Service does not have the information requested and cannot provide estimates.

DECLARATION

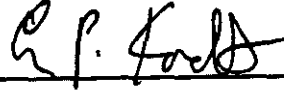
I, Gerald L. Musgrave, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

G. MUSGRAVE

Dated: 10-22-01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in dark ink, appearing to read "E. P. Koetting", is written over a horizontal line.

Eric P. Koetting

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